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April 27, 2023

VIA ECF

Honorable Andrew L. Carter Jr.
United States District Court
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, New York 10007

Re: Lovati et ano v. The Bolivarian Republic of Venezuela, 19-cv-04793-ALC-VF
Lovati et ano v. The Bolivarian Republic of Venezuela, 19-cv-04796-ALC-VF

Your Honor:

This firm represents plaintiffs in the above-captioned cases. I write to advise you of an issue that has come up in negotiating the terms of the proposed judgment we are scheduled to submit on May 2 in accordance with the Amended Opinion and Order entered by the Court on March 23, 2023 (D.E. 112, 116.), and to respectfully request an extension of that deadline by approximately one month. Counsel for the defendant, Republic of Venezuela, consents to this request.

As set forth in the Republic's letter of March 15 (D.E. 111, 115), the parties had agreed to extend the date for submission of the proposed judgment to account for additional payments coming due on March 16 and May 7. However, in the course of negotiating a proposed judgment, the parties recognized that the Republic will have a thirty-day grace period to cure any default of the scheduled May 7 payment, which includes both principal and interest.

To account for this cure period, the parties have agreed, with the Court's permission, to wait until June 7 to submit the proposed judgment, with the additional deadlines to respond and reply extended until June 9 and June 12. We will also submit a proposed supplemental order that will take account of the May 7 payment of principal and the interest accruing between May 7 and June 7.

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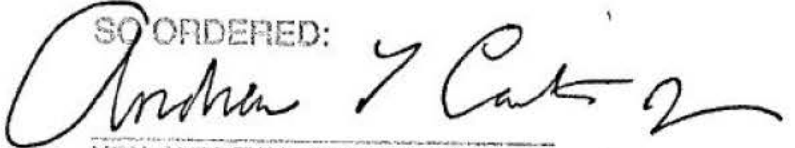
If the revised schedule is satisfactory to you, please let us know. We are also available to discuss this matter further if you prefer.

Thank you for your attention.

Respectfully yours,


Anthony J. Costantini

AJC/gg

SO ORDERED:


HON. ANDREW L. CARTER, JR.
UNITED STATES DISTRICT JUDGE
4/28/2023